
Special Conditions for Municipal Dischargers

Permit Components

Industry-Specific Components

- Effluent Guidelines
- BPJ

Components of All Permits

Cover Page

Effluent Limitations

Technology-Based

Water Quality-Based

Monitoring & Reporting Requirements

Special Conditions

Compliance Schedules

Storm Water

Special Studies, Evaluations, and Other Requirements

Standard Conditions

Municipal-Specific Components

- Secondary
- Equivalent to Secondary

- *Pretreatment*
- *CSOs*
- *Municipal Sewage Sludge*



Learning Objectives

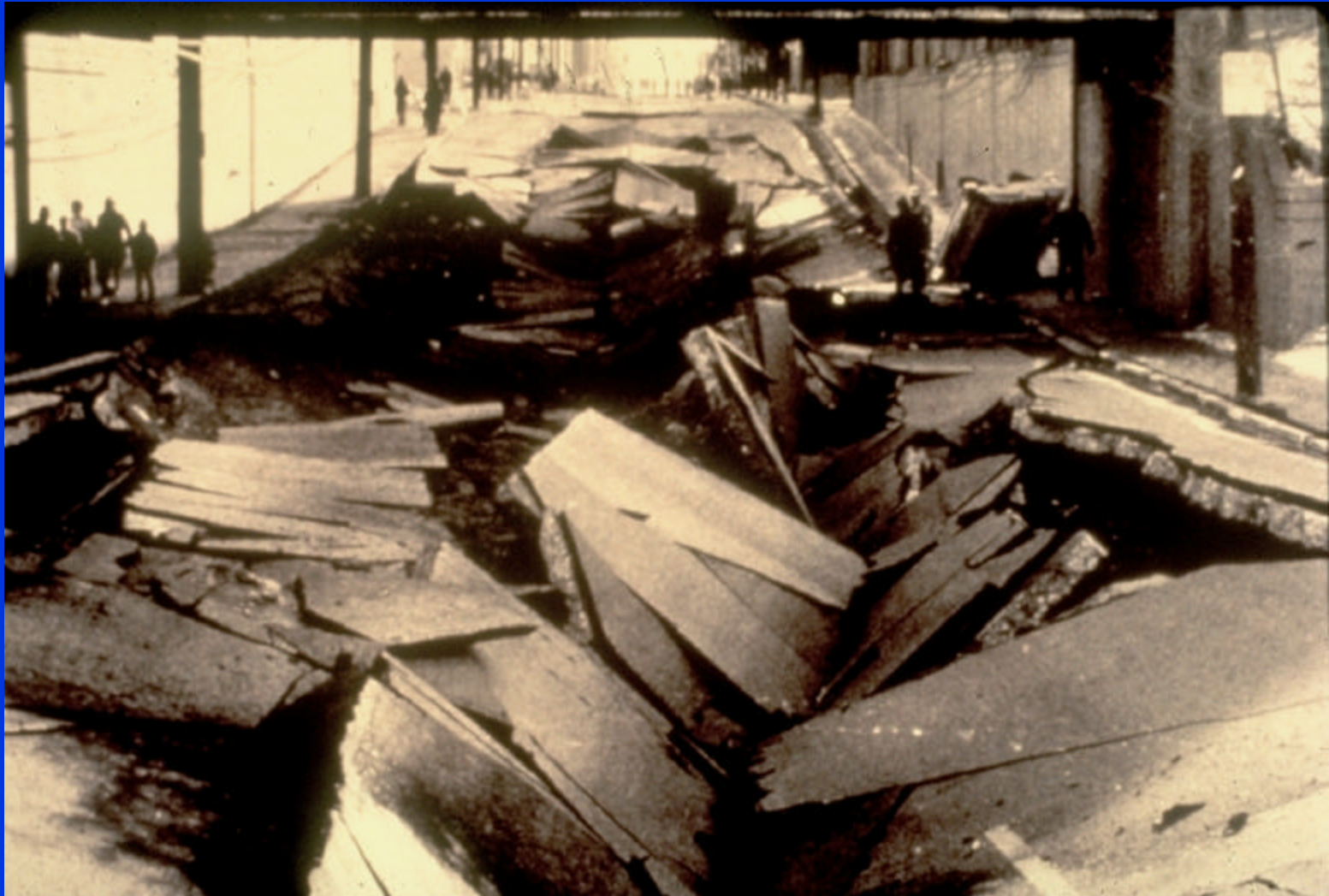
- ◆ Define pretreatment program requirements
- ◆ Define sewage sludge requirements
- ◆ Define combined sewer overflow requirements

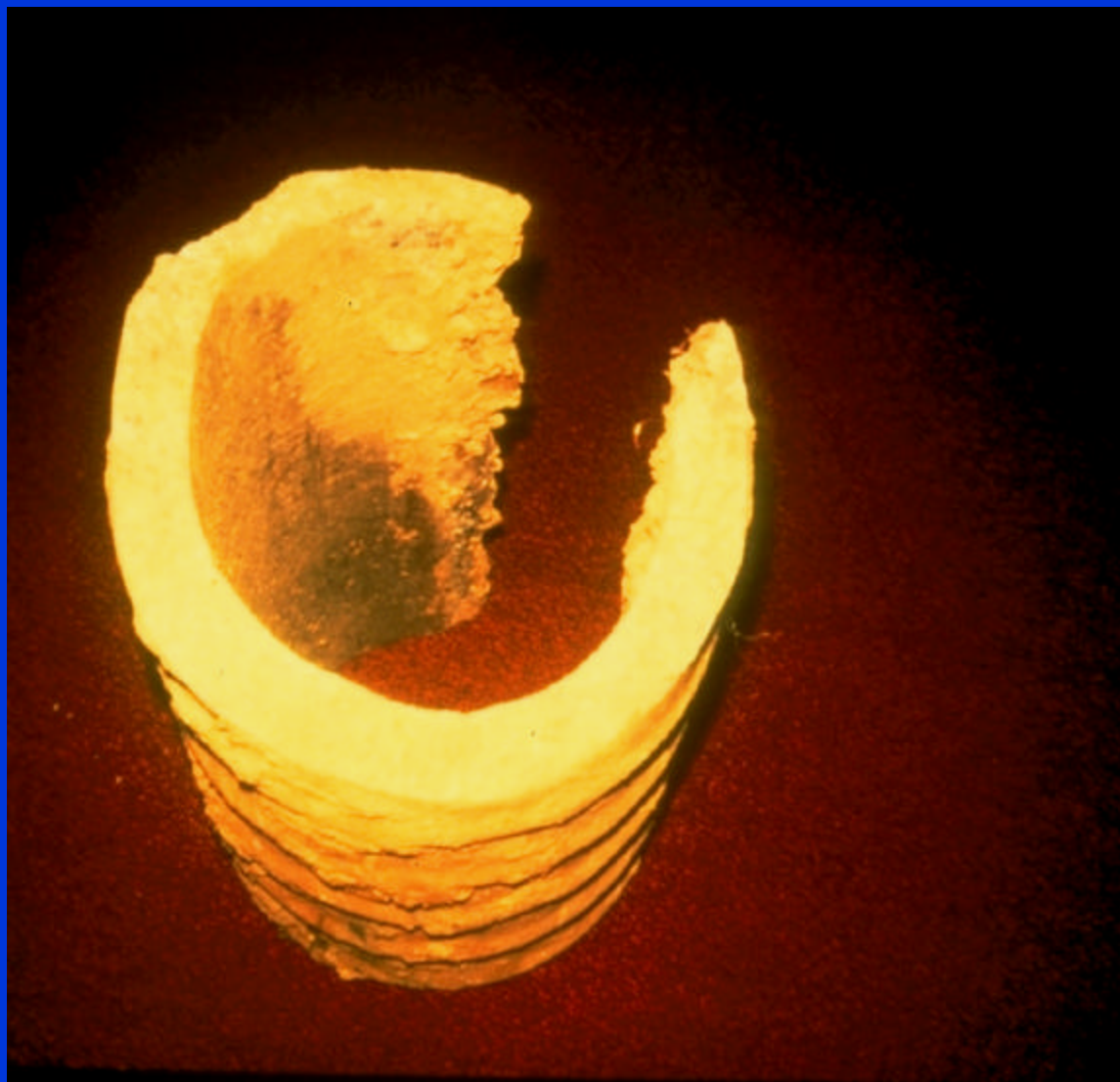
Domestic Sewage Exclusion

- ◆ Domestic sewage or any mixture of domestic sewage and other wastes that pass through a sewer system to a POTW are not considered “solid waste” under RCRA...
- ◆ Unless received at the POTW by:
 - Truck
 - Rail
 - Dedicated pipeline

National Pretreatment Program

- ◆ Major goal is controlling discharges in order to:
 - Prevent interference with POTW processes
 - Prevent pass through of pollutants
 - Protect sludge management options
- ◆ Additional programmatic goals
 - Encourage recycling and reclamation
 - Ensure POTW personnel health and safety

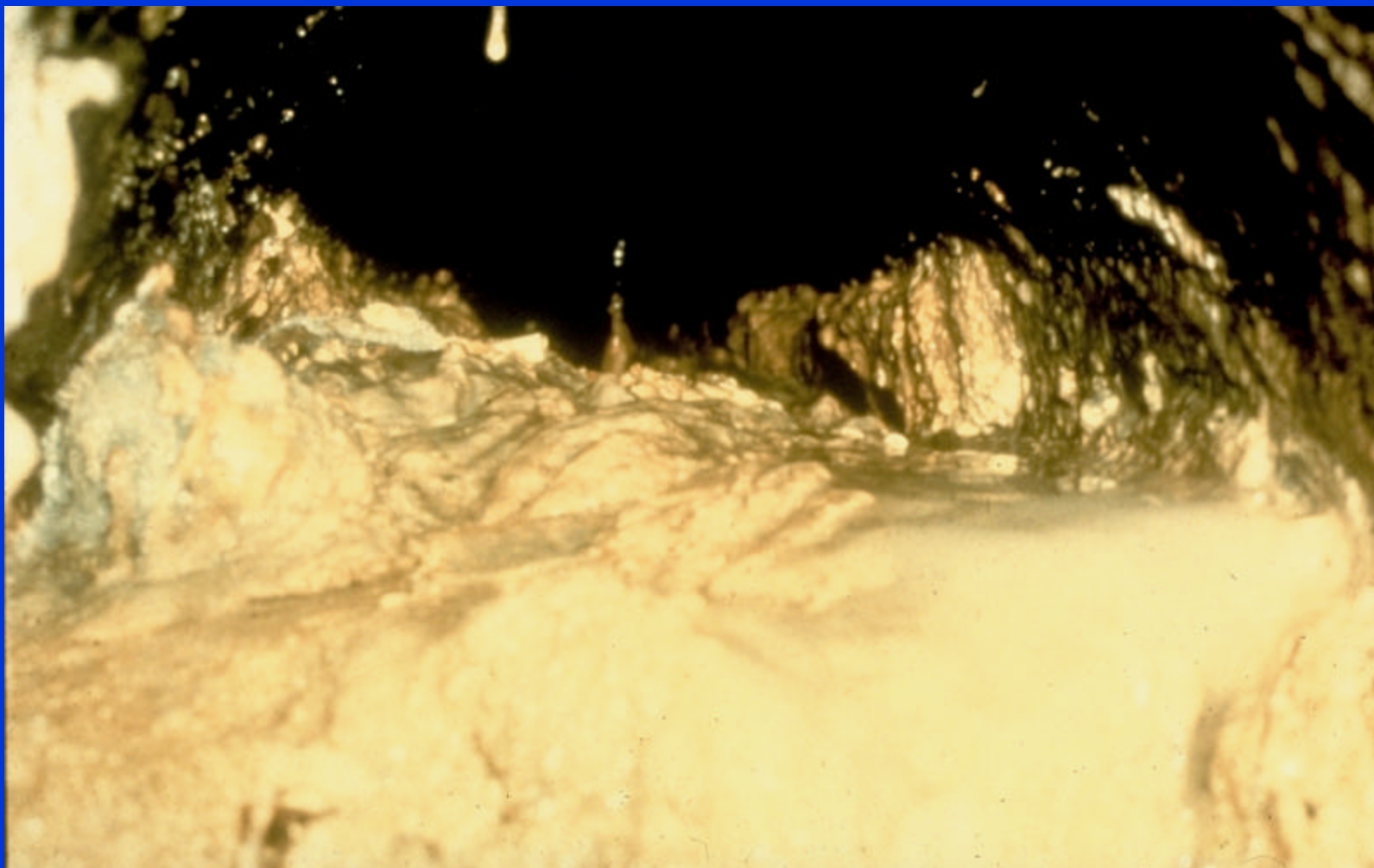












Regulatory Requirements – General Pretreatment Regulations (40 CFR PART 403)

◆ Elements:

- National Pretreatment Standards**
- Requirements for POTW and State programs**
- Industrial and POTW reporting requirements**

◆ Effluent Limitations Guidelines (40 CFR 405-471)

- Including categorical pretreatment standards**



Pretreatment Program Development

◆ Who?

- POTWs > 5 MGD with dischargers subject to standards
- POTWs < 5 MGD with past problems
- Unless State assumes total responsibility for program implementation (403.10(e))

◆ What?

- Legal authority
- Industrial user survey
- Individual control mechanisms for all SIUs
- Compliance/enforcement
- Resources
- Data management



NPDES Permits Drive the Pretreatment Program by Requiring:

- ◆ **Adequate legal authority**
- ◆ **Maintaining industrial user inventory**
- ◆ **Development/implementation local limits**
- ◆ **Individual control mechanisms be issued to all SIUs**
- ◆ **Compliance monitoring activities**

NPDES Permits Drive the Pretreatment Program by Requiring:

- ◆ **Swift and effective enforcement**
- ◆ **Data management and recordkeeping**
- ◆ **Reporting to the approval authority (EPA or State)**
- ◆ **Public participation**

Permits for Municipal Sewage Sludge (Biosolids)

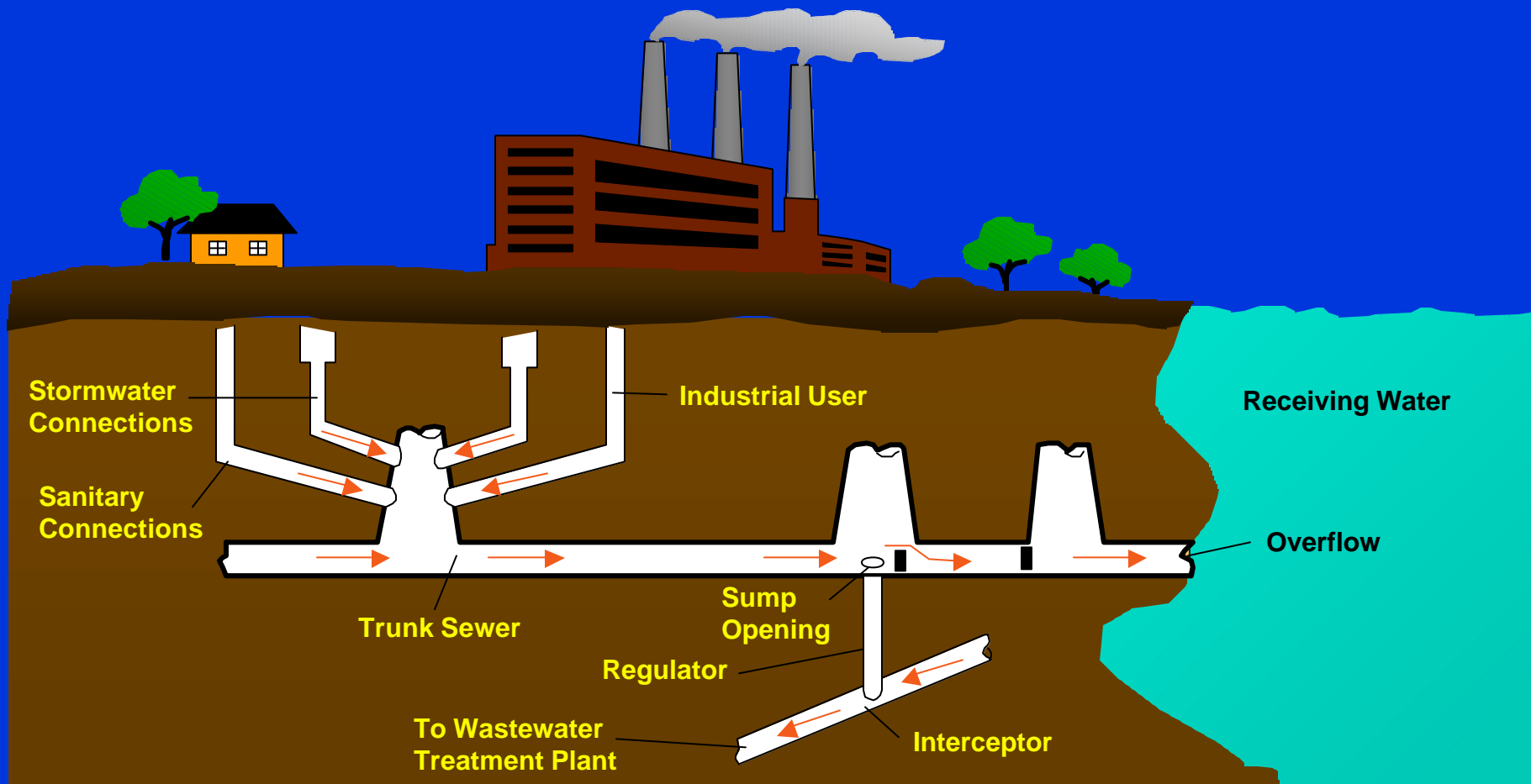
- ◆ Any Section 402 permit issued to a POTW should contain requirements for sewage use and/or disposal
- ◆ 40 CFR Part 503 requirements should be incorporated into a permit for:
 - Incineration
 - Land application
 - Surface disposal



Permits for Municipal Sewage Sludge (Biosolids) (Continued)

- ◆ Other entities may be delegated responsibility to comply (40 CFR Part 503 standards and requirements may not all be placed in the POTW permit)
- ◆ Permits must contain:
 - Additional standard conditions
 - Special conditions

Typical Combined Sewer System Configuration



Requirements for Combined Sewer Overflows (CSOs)

- ◆ **Technology-based requirements (BPJ)**
 - BAT (none promulgated)
 - BCT (none promulgated)
- ◆ **Applicable State water quality standards**

Considerations for Developing Special Conditions for CSOs

- ◆ Characteristics of the discharge
- ◆ Control technologies
- ◆ CSO control policy

Overview of CSO Control Policy Approach

